

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

RAYCO MANUFACTURING, INC., ) Case No. 5:17-CV-0084  
 )  
 Plaintiff, )  
 ) Judge Sara Lioi  
 v. )  
 ) **JOINT STATUS REPORT DUE**  
 BEARD EQUIPMENT COMPANY, ) **JUNE 1, 2017**  
 )  
 Defendant. )

Now come the parties pursuant to the Case Management Plan and Trial Order issued March 1, 2017, and hereby report as follows:

- 1) Discovery that has occurred during the reporting period: Defendant responded to discovery issued by Plaintiff on April 20, 2017. Plaintiff's counsel sent a letter pursuant to Civil Rule 37(a) on May 16, 2017, in a sincere, good faith effort to resolve discovery differences without court action. Defendant's counsel responded to that letter on May 30, 2017, but continues to object to responding to the discovery requests in question. Plaintiff would therefore request that the court attempt to resolve the discovery dispute by telephone conference pursuant to Local Rule 37.1(a)(2).
- 2) Settlement discussions that have occurred during the reporting period: None.
- 3) Motions that have been filed or remain pending during the reporting period: None.
- 4) Any development that might give rise to a request to deviate from the schedule outlined in the Case Management Plan and Trial Order: Plaintiff may wish to take discovery depositions based upon certain documents that Defendant continues to object to producing. In the event that this discovery dispute is resolved in Plaintiff's

favor, the delay in producing such documents will likely require deviation from the non-expert discovery deadline of July 7, 2017.

Respectfully submitted,

CRITCHFIELD, CRITCHFIELD & JOHNSTON, LTD.

By: /s/ Andrew P. Lycans  
J. Douglas Drushal (S.Ct. #0016932)  
Andrew P. Lycans (S.Ct. #0077230)  
225 North Market Street, P.O. Box 599  
Wooster, OH 44691  
Phone: 330-264-4444; Fax: 330-263-9278  
E-mail: [ddrushal@ccj.com](mailto:ddrushal@ccj.com); [lycans@ccj.com](mailto:lycans@ccj.com)  
*Attorney for Plaintiff Rayco Manufacturing, Inc.*

STARK & KNOLL CO., L.P.A.

By: /s/ Harry A. Tipping  
Harry A. Tipping (S.Ct. #0011206)  
Christopher A. Tipping (S.Ct. #0078072)  
Harold M. Schwarz, III (S.Ct. #0078072)  
3475 Ridgewood Road  
Akron, OH 44333  
Phone: 330-376-3300; Fax: 330-376-6237  
E-mail: [htipping@stark-knoll.com](mailto:htipping@stark-knoll.com);  
[ctipping@stark-knoll.com](mailto:ctipping@stark-knoll.com);  
[hschwarz@stark-knoll.com](mailto:hschwarz@stark-knoll.com)  
*Attorneys for Defendant Beard Equipment Company*

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Joint Status Report Due June 1, 2017* was filed electronically on this 31st day of May, 2017. Notice of filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Andrew P. Lycans  
Andrew P. Lycans